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June 30, 2000

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RSPA-99-6283-50

U.S. Department of Transportation  
Dockets Management System  
400 Seventh Street, SW  
Washington, DC 20590-0001  
Reference: RSPA-99-6283  
Docket # HM230

Dear Sir:

I own and operate a Nuclear Pharmacy in the state of New Jersey. Although my company is less than a year old, I have been working in the industry for over 20 years. I am writing this letter to express my concern over the proposed "IAEA Safety Series, Regulations for the Safe Transport of Radioactive Material, 1996 Edition, No.ST-1.

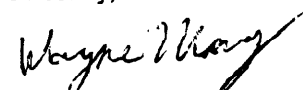
The proposed regulations state that vehicles carrying any material labeled as W-1, Y-II, and Y-III packages would be required to have placards. This is a significant departure from our current practice. Currently, only the vehicles transporting Y-III packages need be placarded. Another part of the DOT regulations, Federal Motor Carrier Safety Regulations, says that individuals driving a placarded vehicle must have a commercial drivers license. As you know, requiring a commercial drivers license for anyone transporting a labeled package would be a significant change and expense in the transport of RAM packages used in nuclear medicine, without any improvement in safety.

In addition to the increased cost associated with hiring only drivers with a commercial drivers license (drug/alcohol testing, annual physicals, vehicle requirements, and increase time to manage the new requirements) these new regulations would be a deterrent to hiring retired personnel that make up a large percentage of our current staff.

Since there would be no obvious safety benefits that would offset the negative financial impact on the nuclear pharmacy industry, my new start-up business and the patients we serve, I am asking that the proposed changes for placarding White-I and Yellow-II packages be dismissed.

Thank-you for your consideration.

Sincerely,



Wayne Wong R.Ph.

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